

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Fair Isaac Corporation and myFICO)
Consumer Services, Inc.;)
)
Plaintiffs,)
)
v.)
)
Experian Information Solutions, Inc.;)
Trans Union LLC; VantageScore)
Solutions, LLC; and Does I through X;)
)
Defendants.)
)
)
_____)

Civil Action No:
0:06-cv-04112 (ADM/JSM)

**DEFENDANTS' COUNTER-DESIGNATIONS IN RESPONSE TO
PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY TO
BE OFFERED AT TRIAL IN LIEU OF LIVE TESTIMONY**

Pursuant to the Court's Order, dated September 3, 2009, Defendant Experian Information Solutions, Inc. ("Experian") hereby submits its counter-designations, which are attached hereto as Appendix A, in response to Plaintiffs' designations of deposition testimony to be offered into evidence in lieu of live testimony. Experian reserves the right to supplement or amend its counter-designations of deposition testimony, as necessary. Experian adopts the counter-designations asserted by any other Defendant in this matter. As noted, in some instances, Experian has counter-designated testimony to which Experian also has lodged an objection, as a protective matter, and such counter-designations do not waive the objection.

Respectfully submitted this 24th day of September, 2009.

Lindquist & Vennum PLLP

By: s/ Mark A. Jacobson

Mark A. Jacobson (MN Bar #188943)

Chris Sullivan (MN Bar #0343717)

4200 IDS Center

80 South Eighth Street

Minneapolis, MN 55402

Tel: (612) 371-3211

Fax: (612) 371-3207

mjacobson@lindquist.com

csullivan@lindquist.com

– and –

White & Case LLP

M. Elaine Johnston

Robert A. Milne

Chris J. Glancy

Jack E. Pace III

1155 Avenue of the Americas

New York, NY 10036-2787

Tel: (212) 819-8200

Fax: (212) 354-8113

mejohnton@whitecase.com

rmilne@whitecase.com

cglancy@whitecase.com

jpace@whitecase.com

*Attorneys for Defendant Experian Information
Solutions, Inc.*

APPENDIX A

Fair Isaac Corp., et al. v. Experian Information Solutions, Inc., et al.
 Civ. Action No: 0:06-cv-04112 (ADM/JSM)

September 24, 2009
 7315757

Kerry Williams Deposition -- June 30, 2008			
Beginning Page	Line	Ending Page	Line
210*	25*	212*	1*
214	21	214	23
215	4	215	8
220	6	220	13
220	15	220	18
221	24	222	10
222	13	223	8
223	14	223	21
243	22	243	25
245	2	245	5
267*	9*	267*	18*
267*	21*	267*	21*

* Counter-designations marked with a "*" are not relevant, and Defendants seek to use them only if the court admits certain designations on Plaintiffs' list.

Fair Isaac Corp., et al. v. Experian Information Solutions, Inc., et al.
 Civ. Action No: 0:06-cv-04112 (ADM/JSM)

September 24, 2009
 7315757

Daniel Hartwig 30(b)(6) Deposition -- July 8, 2008			
Beginning Page	Line	Ending Page	Line
8	7	9	8
14	16	14	25
15	2	15	9
16	4	17	13
28	20	29	19
52*	9*	52*	17*
55	12	55	22
59*	19*	59*	20*
60*	4*	60*	24*
61	2	61	3
61	24	62	12
65	12	65	24
84	24	85	15
95	20	96	5
96	24	97	25
101	3	101	7
113	8	113	18
115	20	115	23
117	12	118	4
119	12	120	6
125	13	125	13
139	2	139	16
140	2	140	5
140*	6*	142*	23*

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Fair Isaac Corp., et al. v. Experian Information Solutions, Inc., et al.
 Civ. Action No: 0:06-cv-04112 (ADM/JSM)

September 24, 2009
 7315757

David Williams Deposition -- July 10, 2008			
Beginning Page	Line	Ending Page	Line
13	5	13	19
14	6	16	14
51	5	52	9
64	9	64	19
86	8	86	11
86	24	87	11
105	21	105	25
106	3	106	3
106	25	107	11
122	4	122	10
122	17	122	24
135	9	135	17
135	19	135	20
167	16	168	15
171	3	171	6
171	12	171	21
172	4	172	7
172	10	172	15
172	18	173	7
214	9	215	4
232	7	232	9
267	24	268	11
268	13	268	22
268	25	269	12
269	24	270	24
293	17	293	23
295	6	295	16
325	3	325	10
David Williams Deposition -- July 31, 2008			
Beginning Page	Line	Ending Page	Line
458	22	459	4
459	11	460	9
460	11	461	4
461	6	461	8
462	8	463	2
463	5	463	20
463	23	464	6
466	18	467	2

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Fair Isaac Corp., et al. v. Experian Information Solutions, Inc., et al.
 Civ. Action No: 0:06-cv-04112 (ADM/JSM)

September 24, 2009
 7315757

478	12	478	14
478	17	479	6
482	17	484	6
485	9	486	11
486	13	486	13
487	11	487	20
494	24	500	21
500	23	502	15
650	4	651	23
655	3	655	21
655	23	655	25
656	3	656	7
656	9	656	15
656	17	656	22
656	24	657	7
657	9	657	9

Fair Isaac Corp., et al. v. Experian Information Solutions, Inc., et al.
 Civ. Action No: 0:06-cv-04112 (ADM/JSM)

September 24, 2009
 7315757

Stan Oliai Deposition -- April 24, 2008			
Beginning Page	Line	Ending Page	Line
161	10	162	3
189	2	189	19
289	13	189	17
130*	11*	130*	15*
130*	20*	130*	22*
163*	21*	163*	25*
164*	19*	164*	21*
164*	24*	164*	24*
165*	12*	165*	12*
165*	14*	165*	14*
165*	25*	165*	25*
166*	3*	166*	7*
166*	10*	166*	11*
198*	24*	199*	24*
235*	10*	235*	11*
235*	14*	235*	17*
235*	19*	236*	5*
Stan Oliai Deposition -- April 25, 2008			
Beginning Page	Line	Ending Page	Line
363*	11*	363*	13*
363*	15*	363*	24*
364*	4*	364*	9*
380*	5*	380*	7*
380*	9*	380*	15*
Stan Oliai Deposition -- July 16, 2008			
Beginning Page	Line	Ending Page	Line
589	11	589	14
589	17	589	22
589	24	590	9
590	13	590	17
590	19	590	21
592	3	592	8
592	11	592	12
593	6	593	15
594	4	595	14
599	20	599	23
600	2	601	23
602	13	602	17

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Fair Isaac Corp., et al. v. Experian Information Solutions, Inc., et al.
 Civ. Action No: 0:06-cv-04112 (ADM/JSM)

September 24, 2009
 7315757

602	22	603	8
603	18	604	8
606	4	606	9
606	12	606	18
606	24	607	11
607	24	608	12
612	22	613	11
615	16	616	6
617	9	617	11
617	20	617	22
617	23	617	24
618	2	618	2
618	9	618	12
618	21	618	23
618	25	618	25
620	20	622	4
624	16	625	4
625	7	625	10
625	14	625	19
626	11	627	10
627	16	627	21
632	5	632	14
638	7	638	10
639	4	639	10
639	12	639	17
639	21	640	6
660	6	660	7
660	13	660	23
662	20	662	20
662	22	663	2
671	10	671	11
671	14	671	18
675	3	675	5
675	11	675	23
684	14	684	17
687	7	689	10
692	6	692	18
701	15	701	18
701	22	702	21
703	15	703	19

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Fair Isaac Corp., et al. v. Experian Information Solutions, Inc., et al.
Civ. Action No: 0:06-cv-04112 (ADM/JSM)

September 24, 2009
7315757

703	24	704	4
869	15	869	19
869	25	870	6
883	16	883	21
883	24	884	9
884	12	884	16
906*	22*	908*	10*

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Fair Isaac Corp., et al. v. Experian Information Solutions, Inc., et al.
Civ. Action No: 0:06-cv-04112 (ADM/JSM)

September 24, 2009
7315757

Charles Robida Deposition -- May 13, 2008			
Beginning Page	Line	Ending Page	Line
16	16	17	6

Fair Isaac Corp., et al. v. Experian Information Solutions, Inc., et al.
 Civ. Action No: 0:06-cv-04112 (ADM/JSM)

September 24, 2009
 7315757

Matt Schwab Deposition -- June 26, 2008			
Beginning Page	Line	Ending Page	Line
112	21	113	7
113*	14*	113*	22*
130	6	130	14
130	23	131	10
132	24	133	13
260	24	261	5
261	19	262	9

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Fair Isaac Corp., et al. v. Experian Information Solutions, Inc., et al.
 Civ. Action No: 0:06-cv-04112 (ADM/JSM)

September 24, 2009
 7315757

Peter Carroll Deposition -- April 8, 2008			
Beginning Page	Line	Ending Page	Line
53*	22*	53*	24*
62*	19*	62*	21*
62*	24*	63*	7*
65*	4*	65*	5*
65*	8*	65*	10*
70*	5*	70*	12*
78*	12*	78*	23*
110*	5*	110	12*
110*	14*	110*	15*
110*	18*	110*	20*
143*	20*	144*	3*
197*	21*	197*	24*
203	17	203	20
203	24	204	7
211	13	211	15
220	21	220	23
221	2	221	5
226	10	226	16
233	2	233	4
233	6	233	6
304	18	304	20
305	8	305	18

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Fair Isaac Corp., et al. v. Experian Information Solutions, Inc., et al.
 Civ. Action No: 0:06-cv-04112 (ADM/JSM)

September 24, 2009
 7315757

Piyush Tantia Deposition -- May 30, 2008			
Beginning Page	Line	Ending Page	Line
121*	24*	121*	25*
122*	4*	122*	13*
153*	24*	154*	4*
154*	11*	154*	11*
185*	20*	185*	21*
185*	25*	186*	2*
189*	20*	189*	23*
190	3	190	9
254	12	254	13
255	21	256	8
256	14	256	18

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